

1 Michael R. Mordaunt, Esq., Bar No. 66911
2 Lori A. Reihl, Esq., Bar No. 246395
3 MORDAUNT, ROUNDY, REIHL & JIMERSON
4 A Professional Law Corporation
5 7488 Shoreline Drive, Suite B1
6 Stockton, CA 95219
7 Telephone: (209) 473-8732

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

5 Attorneys for Defendants
6 COUNTY OF SAN JOAQUIN AND DOMINGO RAGASA, RN

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NORLAN PRUDENTE

Case No. 2:20-CV-00482-JAM-DB

Plaintiff(s),

**STIPULATION AND ORDER TO EXTEND
DEADLINES**

vs.

COUNTY OF SAN JOAQUIN and
DOES ONE through TWENTY,
inclusive.

Defendant(s).

Pursuant to the Status (Pre-Trial Scheduling) Order in this action, the initial deadline for expert disclosures was July 16, 2021, with supplemental disclosures due July 30, 2021, and with a discovery cutoff of September 17, 2021. (See Docket No. 11.) Through various Stipulations and Orders those deadlines were extended so that the discovery cutoff is currently October 18, 2021. (See Docket Nos. 16-21.)

The parties have now completed expert witness disclosures. The parties have also been working to complete all expert and fact discovery in an effort to complete discovery by the October 18, 2021 deadline. In those efforts several depositions have recently been taken and transcripts are just now being received. The remaining issue for discovery is completion of expert depositions, which are being coordinated. However, both sides need sufficient time for their expert witnesses to review the complete discovery in this action, including recent deposition transcripts. Based on the timing of the current discovery deadline of October 18, 2021 there is insufficient time to supply the expert witnesses with the most recent discovery and coordinate and complete the five separate

1 expert depositions.

2 Therefore, the parties jointly request an extension on the discovery deadline. This extension
3 is longer than prior requests with the hope that the parties will not need to seek any further
4 extensions following this stipulation. Based on this new discovery deadline the parties agree and
5 stipulate that the remaining dates and deadlines in the current Scheduling Order will also need
6 to be extended as follows:

- 7 • The deadline to complete discovery shall be extended from October 18, 2021 to
8 December 2, 2021.
- 9 • The deadline to file dispositive motions shall be extended from October 29, 2021 to
10 January 14, 2022.
- 11 • The hearing on the motion for summary judgment shall be continued from
12 December 7, 2021 to February 22, 2022 at 1:30pm.
- 13 • The final pre-trial conference shall be continued from January 21, 2022 to
14 April 22, 2022 at 10:00am.
- 15 • The jury trial in this matter shall be continued from March 14, 2022 to
16 June 6, 2022 at 9:00am.

17 SO STIPULATED.

18 Dated: _____

LEADER-PICONE & YOUNG, LLP

20 By: /s/ Malcolm Leader-Picone
21 Malcolm Leader-Picone, Esq.
22 Attorneys for Plaintiff
23 NORLAN PRUDENTE

24 Dated: _____

MORDAUNT, ROUNDY, REIHL & JIMERSON

26 By: /s/ Lori Reihl
27 Lori A. Reihl, Esq.
28 Attorneys for Defendants
COUNTY OF SAN JOAQUIN AND
DOMINGO RAGASA, RN

ORDER

IT IS HEREBY ORDERED that the remaining dates and deadlines in the current Scheduling Order shall be extended as follows:

- The deadline to complete discovery is December 2, 2021.
- The deadline to file dispositive motions is January 14, 2022.
- The hearing on the motion for summary judgment shall be scheduled for March 1, 2022 at 1:30pm.
- The final pre-trial conference shall be scheduled for April 22, 2022 at 11:00am.
- The jury trial in this matter shall be set for June 6, 2022 at 9:00am.

Dated: September 30, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE